



**Trey Judy**  
**Director – Regulatory**

June 13, 2016

**By Electronic Transmission**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

***RE: Connect America Fund, WC Docket No. 10-90; Universal Service Contribution  
Methodology, WC Docket No. 06-122***

Dear Ms. Dortch:

On June 9, 2016, the undersigned Trey Judy, Director – Regulatory of Hargray Communications Group, Inc. (Hargray), met with Victoria Goldberg, Carol Matthey, Alexander Minard, and Suzanne Yelen of the Wireline Competition Bureau, to discuss issues pending in the above-cited proceedings relating to the reform of the FCC's system for providing support to high-cost, rate-of-return local exchange carriers.

Hargray discussed relative priorities of issues raised in petitions for reconsideration as well as timing concerns related to implementation of universal service reform.

Hargray noted that if the FCC can start the process of determining the level of competitive overlap by publishing the set of census blocks listed on FCC form 477 as served by potential competitors, companies will be able to make a more informed model election. Having this data published will allow companies to evaluate their worst case scenario if they elect to remain under rate of return regulation.

Hargray noted that imputation of ARC charges for broadband lines that were in service when inter-carrier benchmarks were set was not appropriate. The exact number of broadband lines where the customer does not also subscribe to voice service is calculated as of December 31<sup>st</sup> each year as part of the cost study. Hargray suggested that an average of the count from two successive year end studies could be used to estimate the count as of July 1<sup>st</sup> of any given year.

Hargray also reiterated the need to require sufficient detail from competitors so that incumbent carriers will be able to determine what areas and number of customers the competitor is claiming to be able to serve within ten (10) days and for which customers the competitor makes no such claim.

Lastly, Hargray reiterated its support for using the ACAM model only on a voluntary basis and cautioned against any plan that expanded its use on a mandatory basis.

If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Trey Judy  
Trey Judy

cc: Suzanne Yelen  
Carol Matthey  
Alexander Minard  
Victoria Goldberg